

Secretary

Notice of Proposed Rulemaking (NPRM) for Universal Licensing System
WT Docket 98-20

ed user in the GMRS radio service (call sign KAF-9069). I wish to comment
M concerning radical changes to the GMRS. My use of GMRS comes as part
bership with Nassau County REACT, Inc., a local affiliate of REACT

volunteer public-service organization. My team provides mobile road patrol
medical care at traffic incidents on the state parkways within our county, as
special events. We rely on our GMRS radio service for reliable radio
on, in furtherance of our public- and motorist-assistance communication. I feel
changes would have a radical negative impact on our ability to effectively
utilizing GMRS. Being a volunteer organization which receives no government
members purchase their own portable and mobile radios. The team purchased
as a repeater, as well as spare radios. In addition to the very large capital
cost, a frequency change would bring with it significant licensing, site survey, and
costs - costs which we cannot afford.

to eliminate station coordination will likely cause even greater interference and

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discourteous co-channel communication than is present now. For the most part, myself and my team-mates have fostered close relationships with other licensees on our frequency. Eliminating coordination, in combination with all-channel licensing, will all but eliminate the potential for working relationships between fellow users. The current "two-channels-plus-675" licensing works very well and serves our needs; we have heard no complaints from other users about the need for greater frequency access.

If the proposal is enacted, GMRS is likely to go the way of CB-radio. This will bring about large-scale idle chit-chat, no FCC enforcement, and no way to limit unauthorized users on repeaters. All existing repeaters will end up being community repeaters. Alternatively, ourselves and other users will switch to digital private-line tones or other access codes. This will eliminate the possibility of other channel users utilizing our trained dispatchers to report motorist-advisories and emergencies. While I would favor "two-channels-plus-any-for-emergencies", all-channel licenses defeat the need for licenses at all!

As I stated before, the team had to do considerable fund raising to purchase and maintain our repeater. All of this would be for naught if any user could utilize it. It is also likely to cause site access problems for us. Due to our public-service function, we receive very desirable repeater space from our county, free of charge. A condition of this site access is use of the repeater for official motorist assistance and emergency traffic only, with minimal personal traffic. If our repeater became *de facto* a community repeater, we are likely to face loss of space from the county.

Additional users would likely overpower our mobile units, especially those relying on portable hand held radios. Our members need these radios while working at incident scenes. Our fellow channel users know our operation and give us priority for scene management radio traffic. In return, we know to hold all nonessential traffic while they are communicating. New users are more likely to step on the very communications which are most critical, such as those from portable radios.

GMRS need not be made into a hobby or recreational chit-chat band. There is adequate space in CB for local chatter, and in the amateur radio bands (already grossly delicensed with non-code technician class licenses) for DXing and other use.

Regarding §95.29 (all channel-licensing) - This proposal will adversely affect our operation, with no benefit to current users. Future users are welcome to share the band under the current licensing scheme.

Regarding §95.47 (large urban areas) - This proposal will adversely affect us as we operate on Long Island, part of the New York metropolitan region. Any additional interference in this heavily populated area could rapidly inundate our radio operations.

Regarding §95.46, §95.129, §95.135, and Appendix A - A proliferation of new repeaters with overlapping coverage (made possible due to the elimination of coordination), and additional high-powered non-directional stations will likely increase co-channel radio interference. One need only listen to CB radio to hear how high-powered base stations located in high-rise

buildings within New York City can drown out legal communication in the suburbs!

Regarding §95.53 through §95.59 and §95.173(b)(3) - This would allow unauthorized users to use our team's repeater, invoking some of the problems I discussed above. These changes would permit "DXing", hurting GMRS mobile operations for the sake of recreational chatters and technology-buffs. And further, these changes would likely increase repeater-to-repeater interference.

Regarding §95.75 - Elimination of the basic licensing information would effectively eliminate FCC enforcement against even the most flagrant abuses (likely, considering the proposed watered-down rules).

Regarding §95.175 - Elimination of the provisions for cooperation in channel sharing will eliminate all of our hard work to foster relationships with fellow licensees. This will revoke the most basic radio-use and courtesy requirements, allow users to step on on-going conversations, allow long conversation more suitable for other bands or media, and allow traffic which is currently not permitted.

In summary, as a duly licensed user of the General Motorist Radio Service, I respectfully ask that you consider the adverse impact of your NPRM and either radically re-write it to preserve the current legal protections for users, or better yet - withdraw the proposal altogether and leave the radio service as it currently is. GMRS functions well and serves its purpose, allow us to continue to provide our service without the hassle of communication

difficulties.

Respectfully,

A handwritten signature in cursive script, appearing to read "Richard Mendelson", followed by a long horizontal flourish.

Richard Mendelson

cc:

PSRG
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